

<p><b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b></p> <p><b>Law Offices of Mitchell Malzberg, LLC</b> Mitchell Malzberg, Esq. P.O. Box 5122 6 E. Main Street, Suite 7 Clinton, NJ 08809 Telephone: (908) 323-2958 Facsimile: (908) 933-0808</p> <p><b>McAFEE &amp; TAFT</b> A Professional Corporation 10<sup>TH</sup> Floor, 2 Leadership Square 211 N. Robinson Oklahoma City, OK 73102 Louis J. Price Beauchamp M. Patterson (405) 235-9621 (405) 239-0431 Facsimile Attorneys for DIP Lender Lemonis Fischer Acquisition Company, LLC</p> <p>In re:</p> <p>CRUMBS BAKE SHOP, INC., <i>et al.</i><sup>1</sup></p> <p>Debtors-in-Possession.</p>	<p>Case No. 14-24287 (MBK) Judge: Michael B. Kaplan</p> <p>Chapter 11 (Jointly Administered)</p> <p>Hearing Date: October 31, 2014 at 10:00 a.m.</p>
--	--

**Notice of Lemonis Fischer Acquisition Company, LLC's Motion For an Order In Aid of the Court's Order Under 11 U.S.C. §§105(a), 363 and 365 (I) Authorizing and Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances, and Interests, (II) Authorizing and Approving the Assumption and Assignment of Certain Unexpired Leases of Non-Residential Real Property In Connection With the Sale, and (III) Granting Related Relief [Docket # 195], dated August 27, 2014**

PLEASE TAKE NOTICE that on October 31, 2014 at 10:00 a.m. or as soon thereafter as counsel may be heard, the undersigned, attorney's for Lemonis Fischer Acquisition Company LLC shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States

<sup>1</sup> The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's tax identification number are: Crumbs Bake Shop, Inc. (5274); Crumbs Holdings LLC (8045); Crumbs 42<sup>nd</sup> Street II, LLC (5913); Crumbs Broad Street, LLC (5319); Crumbs Broadway LLC (2653); Crumbs Federal Street, LLC (9870); Crumbs Garment Center LLC (5142); Crumbs Grand Central LLC (5030); Crumbs Greenvale LLC (6562); Crumbs Greenwich, LLC (3097); Crumbs Hoboken, LLC (5808); Crumbs II, LLC (5633); Crumbs Larchmont, LLC (8460); Crumbs Lexington LLC (0286); Crumbs Park Avenue LLC (5273); Crumbs Retail Bake Shops, LLC (f/k/a Crumbs Fulton Street, LLC) (0930); Crumbs Stamford, LLC (8692); Crumbs Third Avenue LLC (6756); Crumbs Times Square LLC (1449); Crumbs Union Square LLC (8629); Crumbs Union Station LLC (6968); Crumbs West Madison, LLC (5017); Crumbs Woodbury LLC (2588)

Bankruptcy Court, 402 East State Street, Trenton, New Jersey 08608, for an Order in Aid of the Court's *Order Under 11 U.S.C. §§105(a), 363 and 365 (I) Authorizing and Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances, and Interests, (II) Authorizing and Approving the Assumption and Assignment of Certain Unexpired Leases of Non-Residential Real Property In Connection With the Sale, and (III) Granting Related Relief* [Docket # 195], dated August 27, 2014.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Application which sets forth the relevant factual and legal bases upon which the requested relief should be granted.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the requested relief shall be in writing, state with particularity the basis of the objection and be filed with the Clerk of the Court and shall be served in accordance with service requirements of the Administrative Procedures so as to be received no later than seven (7) days before the hearing set forth above.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a), and the relief requested may be granted without a hearing.

Respectfully submitted,

By: /s/ *Mitchell Malzberg* \_\_\_\_\_  
MITCHELL MALZBERG, ESQ.  
LAW OFFICES OF MITCHELL J.  
MALZBERG, LLC  
P.O. Box 5122  
6 E. Main Street, Suite 7  
Clinton, NJ 08809  
*Local Counsel for DIP Lender Lemonis Fischer  
Acquisition Company, LLC*

-and-

By: /s/ Beauchamp M. Patterson  
BEAUCHAMP M. PATTERSON, ESQ.  
McAFEE & TAFT  
10<sup>TH</sup> Floor, 2 Leadership Square  
211 N. Robinson  
Oklahoma City, OK 73102  
*Attorneys for DIP Lender Lemonis Fischer  
Acquisition Company, LLC*

Dated: October 10, 2014